

# **EXHIBIT B**



LAW FIRM OF  
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ADMITTED: NEW YORK, NEW JERSEY,  
U.S.D.C. SOUTHERN DISTRICT OF NEW YORK,  
U.S.D.C. EASTERN DISTRICT OF NEW YORK,  
U.S.D.C. DISTRICT OF NEW JERSEY

January 29, 2025

**VIA EMAIL**

Rachel M. Dikovics, Esq.  
Lowenstein Sandler LLP  
One Lowenstein Drive  
Roseland, New Jersey 07068  
[rdikovics@lowenstein.com](mailto:rdikovics@lowenstein.com)

**Re: Hazem Alsegin v. Mercer County Community College and Infinity Flight Group LLC.**

Dear Ms. Dikovics:

Thank you for your letter of January 28, 2025. As you are aware, we represent Plaintiff Hazem Alsegin in the above-referenced matter. At this time, we will not offer instruction as to the many ways which your letter is substantively and procedurally deficient as a Rule 11 Sanctions notice letter. Rather, we wish to make it perfectly clear that we will not dignify threats and intimidation tactics.

The manner in which you have proceeded is inappropriate. Your letter details factually nuanced assertions about the relationship between Infinity Flight Group LLC (“IFG”) and Mercer County Community College (“MCCC”), which you expect us to take at face-value just on your own say-so. Your factual assertions are not supported by sworn declarations, agreements, business records, or other documentary evidence which would substantiate them. Had such substantiating evidence been provided, then we could have had a serious and constructive dialogue about perhaps amending our Complaint to limit causes of action against IFG. At this juncture though, you have not provided us with any reasonable basis to do so. Your omission to provide us with any documentary basis to assess your assertions, and instead proceeding with intimidation tactics certainly concerns us.

For instance, at numbered paragraph “4” of your January 28, 2025 letter, you assert that “there is no direct connection between IFG and Alsegin” and that IFG merely “leases aircraft to MCCC, which MCCC uses in its Flight Program, which is taught by MCCC employees.” This characterization of the relationship between IFG and MCCC is at odds with MCCC’s own description of the Aviation Flight Technology Program. MCCC holds out IFG as a “partner” in providing its program. **See, Ex. 1 attached.** Surely IFG is aware of this.

Lastly, we expect that you are aware that F.R.C.P. 11(b)(1) requires that written motions are not “presented for any improper purpose, *such as to harass*, cause unnecessary delay, or needlessly increase the cost of litigation[.]” (Emphasis added). Motions for sanctions seeking relief under Rule 11 are written motions to which the call of F.R.C.P. 11(b)(1) applies. *See, e.g., Francis v. TD Bank, N.A.*, 2014 U.S. Dist. LEXIS 57131 (DNJ Apr. 24, 2014, No. 12-7753 [RBK/AMD]), *United States v. Wanaque Convalescent Ctr.*, 2019 U.S. Dist. LEXIS 220732 (DNJ Nov. 25, 2019, Civil Action No. 2:14-CV-06651-KSH-SCM). The Third Circuit Court of Appeals has admonished against the use of Rule 11 as an intimidation tactic, noting that “[t]he use of Rule 11 as an additional tactic of intimidation and harassment has become part of the so-called ‘hardball’ litigation techniques espoused by some firms and their clients. Those practitioners are cautioned that they invite retribution from courts which are far from enchanted with such abusive conduct.” *Gaiardo v. Ethyl Corp.*, 835 F.2d 479, 485 (3d Cir. 1987).

We trust you understand that we will seek all available remedies against the improper usage of a motion for sanctions pursuant to Rule 11.

Sincerely,

/S/ Pantelis Gallis

Pantelis D. Gallis, Esq.

Law Firm of Omar T. Mohammedi, LLC

*Attorneys for Plaintiff*

233 Broadway, Suite 820

New York, New York 10279

Telephone: (212) 725-3846

CC: Omar T. Mohammedi, Esq.

# EXHIBIT 1

# AVIATION

Aviation Flight Technology - A.A.S. Degree  
Rotorcraft Transition Program (RTP) - A.A.S. Degree  
Aviation Management - A.S. Degree

## PROSPECTIVE STUDENTS

### AVIATION INFORMATION SESSION

Friday, March 7, 2025

2:00pm-3:30pm

The Conference Center at Mercer

Learn more about our Aviation program by attending our information session! This session is designed for prospective students planning to join the program in 2025, but everyone is welcome to attend. The session will feature a presentation by our staff, followed by a 15-minute Q&A. Students who are unable to attend in-person will be able to register to attend virtually. A link for virtual attendance will be provided the day before the event for those who registered to attend virtually.

### REGISTRATION REQUIRED

► **REGISTER NOW**  
(<https://fo>

- **FAQs (faq.shtml)**
- **Student Success (success.shtml)**
- **Scholarships (scholarships.shtml)**
- **Testimonials (testimonials.shtml)**

### Questions or comments?

Contact us by e-mail at [aviation@mccc.edu](mailto:aviation@mccc.edu) (<mailto:aviation@mccc.edu>), or by phone at 609-570-3496 or 609-570-3474

► **A.A.S.-AVIATION FLIGHT TECHNOLOGY**  
(<https://catalog.mccc.edu/programs/aviation-flight-technology>)

► **A.A.S.-ROTORCRAFT TRANSITION PROGRAM**  
(<https://catalog.mccc.edu/programs/rotorcraft-transition-program>)

► **A.S.-AVIATION MANAGEMENT**  
(<https://catalog.mccc.edu/programs/aviation-management>)

## Visit the MCCC



(<https://www.mccc.edu/onestop.shtml>)

### FOR ASSISTANCE WITH:

Course Registration ★ Admission Application ★ Financial Aid ★ Transfer & Career Services ★  
Advisement & Success Coaching ★ Tuition Payment or Payment Plan ★ *much more!*

**VISIT NOW!**  
(<https://www.mccc.edu/aviation/>)

**The MCCC Aviation Flight Technology program** is the ONLY 2-year AABI accredited Aviation Degree Program in the nation. Mercer County Community College's (MCCC) two-year professional pilot program is accredited by the Aviation Accreditation Board International (<http://www.aabi.aero/>) and provides flight instruction for the Private and Commercial certificates as well as the Instrument rating in both single and multiengine aircraft.

The MCCC college aviation program is a practical and affordable way for pilot candidates to work towards their restricted ATP (Airline Transport Pilot) rating which allows students to fast track to the airlines. For students training within a non-college program, the minimum hours for airline employment are 1500 hours. For students completing the MCCC program, the minimum hours for employment at an airline are reduced to 1250. Not only is this a considerable savings of time, it also translates to a huge cost savings!

Students that participate in the Rotorcraft Transition Program concentration will have the opportunity to gain their new fix wing rating while gaining valuable flight time. This flight time will be important as they continue to work toward their ATP certificate, and future employment at the airlines.

While classroom instruction is given at the West Windsor campus, flight training takes place at our partner Infinity Flight Group (<http://infinityflightgroup.com/>). (IFG) located at Trenton Mercer Airport (<https://www.mercercounty.org/departments/transportation-and-infrastructure/trenton-mercerc-airport>) (TTN). Ideally located between New York City and Philadelphia, MCCC students train in some of the busiest airspace in the country. TTN is home to several Fortune 50 corporate flight departments, as well as major airlines, all of which are supported by an award winning air traffic control tower.

Because these programs attract many students using VA benefits, the Department of Veterans Affairs requires documentation to prove that the Institute of Higher Learning (IHL) is adhering to VA guidelines. Specific certificate hours and curriculum are listed under each training track offered. With our partner, Infinity Flight Group, students are billed specific hours for aircraft, flight and ground instruction. MCCC staff and designated representatives operating under the Part-141 Certificate include the following:

- Chief Flight Instructor
- Assistant Chief Flight Instructor
- Progress Check Pilots
- Airman Certification Representative

MCCC staff is responsible for maintaining the Part-141 Certificate, as well as training and approving any Flight Instructors hired and contracted by IFG. Those approved Flight Instructors are charged to instruct under the guidance provided by the FAA as it pertains to the approved syllabus for the Part-141 Certificate. Students begin flight within 7 days from the start of each semester while enrolled in at least one flight course along with other required ground instructional courses to achieve their degree. The flight costs are approved by the Board of Trustees and provided in advance to students so they may be financially prepared for the program.

MCCC offers two training tracks:

## Aviation Flight Technology

### A.A.S. Degree

- [curriculum \(https://catalog.mccc.edu/programs/AVI.FLT.AAS\)](https://catalog.mccc.edu/programs/AVI.FLT.AAS).
- [course descriptions \(https://catalog.mccc.edu/courses?subjectCode=AVI&page=1&cq=\)](https://catalog.mccc.edu/courses?subjectCode=AVI&page=1&cq=).
- **estimated fees** ([estimated\\_fees\\_aft.shtml](#)) (subject to change)
- **Cost of Program** (subject to change)
  - [2024-2025 \(pdf/2024-2025 Traditional Cost of Program Aviation 043024.pdf\)](#) (PDF)
- [additional required equipment \(pdf/AviationAdditionalEquipmentListJune2024.pdf\)](#) (PDF)

## Scholarships Available for Aviation Students

### SCHOLARSHIP DETAILS

### Aviation Flight Technology A.A.S. Degree with Rotorcraft Transition Program (RTP) concentration

\* *This track is separate from AABI accreditation.*

- [curriculum \(https://catalog.mccc.edu/programs/AVI.FLT.RTP.AAS\)](https://catalog.mccc.edu/programs/AVI.FLT.RTP.AAS).
- [course descriptions \(https://catalog.mccc.edu/courses?subjectCode=AVI&page=1&cq=\)](https://catalog.mccc.edu/courses?subjectCode=AVI&page=1&cq=).

- **estimated fees** ([estimated\\_fees\\_aft-rtp.shtml](#)). (subject to change)
- **Cost of Program** (subject to change)
  - [2024-2025 RTP \(pdf/2024-2025 RTP Cost of Program Aviation 43024.pdf\)](#) (PDF)
- [additional required equipment \(pdf/AviationAdditionalEquipmentListJune2024.pdf\)](#) (PDF)
- **RTP Session Dates:**
  - Winter/Spring 2024-25
    - 6A:** December 18 to February 4
    - 6B:** February 7 to March 27
    - 6C:** March 31 to May 12
  - Summer 2025
    - UA:** May 19 to July 3
    - UB:** July 8 to August 18
  - Fall 2025
    - FA:** September 2 to October 20
    - FB:** October 21 to December 19
  - Winter/Spring 2025-26
    - 6A:** December 22 to February 2
    - 6B:** February 5 to March 20
    - 6C:** March 24 to May 8
  - Summer 2026
    - UA:** May 15 to June 30
    - UB:** July 6 to August 14

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# PROGRAM ACCREDITED BY AVIATION ACCREDITATION BOARD INTERNATIONAL (AABI)



## Program:

Aviation Flight Technology A.A.S. degree

January 2023

## STUDENT ACHIEVEMENT DATA

For each AABI-accredited aviation program, institutions MUST accurately publish on the program's public website a report of student achievement data including the following information, updated annually:

- [Student Achievement Data \(pdf/StudentAchievement.pdf\)](#). (pdf)
- [Assessment Plan \(pdf/AviationContinuousAssessmentPlan.pdf\)](#). (pdf)
- [Graduation Rates \(pdf/GraduationRates18-22.pdf\)](#). (pdf)
- [Rates and Types of Employment for Graduates \(pdf/ResultsofEmployment2018.pdf\)](#). (pdf)

## AVIATION MISSION STATEMENT

The mission of the Aviation Flight Technology Program is to produce well educated and informed students who are prepared to successfully transfer to a baccalaureate institution or to continue preparation for a flight career using the knowledge and skill base acquired in their courses at Mercer.

## SUCCESSFUL GRADUATES OF THE PROGRAM WILL:

- Obtain the appropriate ground and flight certificates;
- Fill related aviation positions requiring specific aviation knowledge with airport service operators located at numerous airports in the United States and possessions.

## PROGRAM GOALS AND OBJECTIVES:

The Aviation Flight Technology curriculum prepares students to achieve the expected program-level student learning outcomes identified by the degree program. At the completion of the program, students will be able to:

- Demonstrate the knowledge and skills required to obtain the private and commercial certificates and instrument rating, including aeronautical technical skills and decision-making, while demonstrating safety as their primary focus
- Analyze the effects of social, political, and economic world events on air transportation and how this may impact the aviation industry and careers in aviation
- Describe the events in the development of aviation to the present day and evaluate the impact of these events on today's society

- Demonstrate effective and correct written and verbal communication
  - Research and present information pertinent to their aviation discipline individually and in teams
  - Demonstrate an awareness of the ethical and professional issues associated with the aviation industry, including the importance of becoming a life-long learner in the aviation world
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## ACADEMIC DIVISIONS

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Business, Technology,  
and Professional Studies ([http://www.mccc.edu/business\\_technology.shtml](http://www.mccc.edu/business_technology.shtml))

Math, Science, and Health Professions (<http://www.mccc.edu/hp.shtml>)

Liberal Arts (<http://www.mccc.edu/la.shtml>)

## COLLEGE CATALOG

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General Information ([../catalog/catalog\\_general.shtml](http://www.mccc.edu/catalog/catalog_general.shtml))


Academic Programs ([../catalog/catalog\\_programs.shtml](http://www.mccc.edu/catalog/catalog_programs.shtml))

Credit Courses ([../catalog/catalog\\_courses.shtml](http://www.mccc.edu/catalog/catalog_courses.shtml))

## CONTACT MCCC

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 609-586-4800 (<tel:+6095864800>)

 [admiss@mccc.edu](mailto:admiss@mccc.edu) (<mailto:admiss@mccc.edu>)

 Maps and Directions ([http://www.mccc.edu/welcome\\_directions.shtml](http://www.mccc.edu/welcome_directions.shtml))

West Windsor Campus  
1200 Old Trenton Road  
West Windsor, NJ 08550

James Kerney Campus

102 N. Broad Street  
Trenton, NJ 08608

Select Language ▼

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Mercer County Community College is an equal opportunity institution. Our College values all students, staff, faculty and visitors as we strive for inclusion and safety regardless of one's disability, age, sex, gender identity, sexual orientation, race, ethnicity, immigration status, country of origin, religious or political affiliation, socioeconomic standing, veteran status or any other characteristic or class protected under federal state and local laws. The college affirms that diversity is fundamental to its mission and vision and commits to educating leaders for all sectors of society and public service.